

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY AND KENTUCKY UTILITIES)	
COMPANY FOR REVIEW, MODIFICATION, AND)	CASE NO.
CONTINUATION OF EXISTING, AND ADDITION OF)	2011-00134
NEW, DEMAND-SIDE MANAGEMENT AND)	
ENERGY-EFFICIENCY PROGRAMS)	

COMMISSION STAFF'S FIRST INFORMATION REQUEST TO
COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON,
HARRISON, AND NICHOLAS COUNTIES, INC.

The Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. ("CAC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before August 19, 2011. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The CAC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which CAC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Provide a brief explanation of CAC's understanding of the purpose of Demand Side Management ("DSM") programs. Include in the explanation whether CAC believes that DSM programs should pay for themselves.

2. Provide a brief explanation of CAC's understanding of the purpose of Energy Efficiency ("EE") programs. Include in the explanation whether CAC believes that DSM and EE programs are the same.

3. Refer to page 5 of the Direct Testimony of Jack E. Burch on Behalf of CAC ("CAC Testimony") filed July 25, 2011, wherein CAC states, "Since 1978, the Council has operated a Weatherization Assistance Program designed to help low-income individuals and families conserve energy." Explain how this program works.

4. Refer to page 6 of the CAC Testimony. CAC states, "The Council's Summer Cooling program serves seriously ill and disabled customers with the provision and installation of air conditioners."

a. Explain how this program works.

b. Explain whether CAC receives funding for this program. If funding is received, include the source(s) of the funding.

c. Explain whether CAC counsels Kentucky Utilities Company ("KU") customers as to the availability of the various residential DSM/EE programs for which they may qualify.

d. Explain whether CAC assists customer in identifying conservation methods that might help reduce their energy bills.

e. Explain whether CAC has computers available for use by KU customers so that they can go online and participate in the online audit in the Residential Conservation program.

f. Explain whether CAC encourages KU customers to request the Compact Fluorescent Light ("CFL") bulbs that are available to be mailed free to their homes?

g. Explain whether CAC encourages qualifying KU customers in the low-income areas they serve to participate in the Kentucky Home Performance Program.

h. If KU's efforts to communicate and educate KU customers about the residential DSM/EE programs that are available do not increase participation, explain whether CAC has recommendations for increasing participation.

5. Refer to page 11 of the CAC Testimony, wherein it is stated, "In some states, for example, cost recovery charges are waived on the accounts of low-income customers. The Council would be glad to participate in an exploration of alternatives for low-income customers."

a. Provide those states that waive cost recovery charges and explain how the waiver works in those states.

b. How are costs recovered that are not billed to the low-income customers, by an increased residential DSM factor or through the base energy charge?

c. Explain how it is confirmed that these residential customers are truly low-income customers. What control mechanisms are in place to assure accuracy of this information?

6. Refer to page 11 of the CAC Testimony.

a. In the municipalities and counties that CAC serves, how many residences have been weatherized by the weatherization program that was funded by the American Reinvestment and Recovery Act of 2009 ("ARRA")?

b. Does CAC believe the weatherization program has been successful? Explain.

7. Refer to page 13 of the CAC Testimony and the discussion of the proposed Residential Incentives Program, wherein it is stated, "The Companies have generously agreed to allow third-party organizations-such as providers of low-income home weatherization measures like the Council-to access the rebates associated with this program when they purchase new appliances for customers with programmatic funds."

a. Does the reference to "Companies" mean LG&E/KU?

b. If the answer to 6.a. is yes, since the Companies have agreed to allow third-party organizations like the Council to access the rebates associated with this program when they purchase new appliances for customers with programmatic funds, does CAC provide the remaining funds to cover the total cost of the new appliances? Explain.

8. Refer to page 13 of the CAC Testimony. Provide an explanation of the on-bill financing referenced.

9. Refer to page 14 of the CAC Testimony. CAC believes that the Companies have improved communications with their partners in the development, implementation and refinement of DSM programming. Providing specific examples, explain how communications have been improved.

10. Explain how CAC participates in either LG&E's or KU's Energy Efficiency Advisory Group, or its participation, if any, as an invitee to meetings to discuss DSM/EE programs.

11. Provide a description of CAC's source of funding. What percentage of CAC's funds is used to provide assistance to low-income KU customers?



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

AUG 08 2011

DATED: _____

cc: Parties of Record

Honorable David Jeffrey Barberie
Corporate Counsel
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KENTUCKY 40507

Honorable Kendrick R Riggs
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KENTUCKY 40202-2828

Lonnie Bellar
Vice President, State Regulation & Rates
LG&E and KU Services Company
220 West Main Street
Louisville, KENTUCKY 40202

Honorable Iris G Skidmore
415 W. Main Street
Suite 2
Frankfort, KENTUCKY 40601

David Brown
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KENTUCKY 40202

Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Services Company
220 West Main Street
Louisville, KENTUCKY 40202

Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KENTUCKY 40601-8204

Hon. Tom Fitzgerald
Kentucky Resources Council, Inc.
PO Box 1070
Frankfort, KENTUCKY 40602

Rick E Lovekamp
Manager - Regulatory Affairs
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

Eileen Ordovery
Legal Aid Society
416 West Muhammad Ali Boulevard
Suite 300
Louisville, KENTUCKY 40202